

10051
7 May 2013

Mr Sam Haddad
Director-General
Department of Planning and Infrastructure
GPO Box 39
SYDNEY NSW 2000

Attention: Cameron Sargent

Dear Mr Haddad,

**TEMPORARY CONCRETE BATCHING PLANT, BARANGAROO
REQUEST FOR DIRECTOR-GENERAL'S REQUIREMENTS**

We are writing on behalf of Lend Lease (Millers Point) Pty Ltd (Lend Lease) the proponent for the proposed temporary concrete batching plant at Barangaroo.

On 14 December 2012, Lend Lease requested that the Minister for Planning and Infrastructure consider making the proposed temporary concrete batching plant State Significant Development (SSD) in accordance with Section 89C of the *Environmental Planning & Assessment Act 1979* (EP&A Act). On the 19 April 2013 the Minister issued an Order declaring the Concrete Batching Plant to be SSD under section 89C(3) and for the purposes of the EP&A Act.

Accordingly, the purpose of this letter is to request the Director-General's Requirements (DGRs) for the preparation of an Environmental Impact Statement (EIS) for the proposed temporary concrete batching plant. To support the request for the DGRs this letter provides an overview of the proposed development, sets out the statutory context, and identifies the key likely environmental and planning issues associated with the proposal.

I trust this is all the information you require at this stage, however should you have any queries regarding this matter or require any further particulars then please do not hesitate to contact me on 9409 4921 or mrowe@jbaplanning.com.au.

Yours faithfully

A handwritten signature in blue ink, appearing to read 'Michael Rowe'.

Michael Rowe
Principal Planner

1.0 THE SITE

Barangaroo is located on the north western edge of the Sydney Central Business District (CBD), bounded by Sydney Harbour to the west and north; the historic precinct of Millers Point for the northern half, The Rocks and the Sydney Harbour Bridge approach to the east; and bounded to the south by a range of new development dominated by large CBD commercial tenants, and the King Street Wharf/Cockle Bay precinct.

The 22ha Barangaroo site is generally rectangular in shape and has a 1.4 kilometre harbour foreshore frontage, with an eastern street frontage to Hickson Road. The site location of Barangaroo is shown at **Figure 1**. The site has been divided into three distinct redevelopment areas (from north to south) – the Headland Park, Barangaroo Central and Barangaroo South, and has been subject to multiple investigations that detail the physical and natural characteristics of the site.

The relevant part of Barangaroo for the proposed concrete batching plant is Barangaroo South. Barangaroo South is legally described as Lot 3, Part of Lot 6 and Part of Lot 5 DP 876514. The Barangaroo Delivery Authority owns the majority of Barangaroo South, however small areas are owned by other Government agencies including the Marine Ministerial Holding Corporation, NSW Maritime and the Waterways Authority.

The part of the site relevant to the proposed concrete batching plant is located near the central western part of Barangaroo South, as shown in **Figure 2**. The plant would be located adjacent to the DECCW Remediation Area and the basement for buildings C1-C7 and building R1, R8 and R9 (Basement 1A).

The relevant land where the temporary concrete batching plant would be located is legally described as Lot 5 and Lot 6 DP 876514, owned by Barangaroo Delivery Authority.



Figure 1 – Barangaroo and the Barangaroo South Site

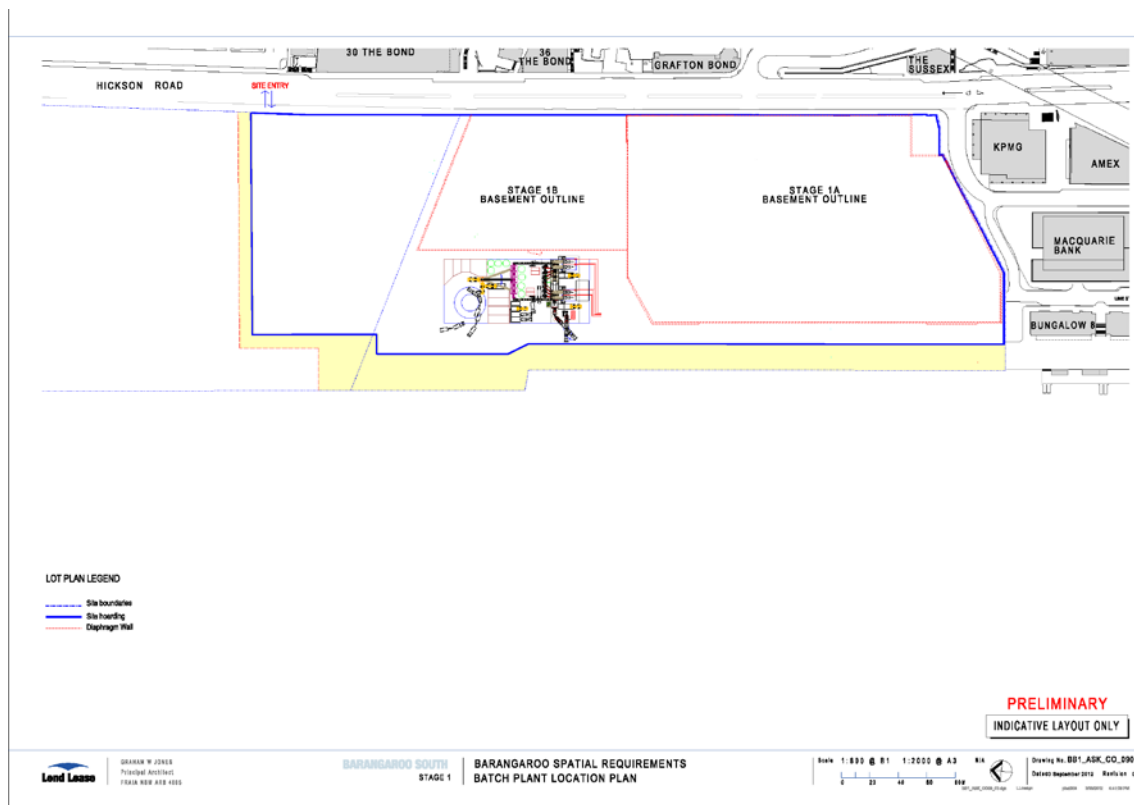


Figure 2 – The Location of the Proposed Concrete Batching Plant

2.0 APPROVED CONCEPT PLAN AND PROJECTS

Development at Barangaroo is subject of a Concept Plan approved under Part 3A of the EP&A Act. The Barangaroo Concept Plan was prepared by the Sydney Harbour Foreshore Authority and approved by the Minister for Planning on 9 February 2007. On 12 October 2007, the land was rezoned to facilitate its redevelopment.

The Concept Plan, was originally approved on 9 February 2007, and has since been modified four times. Modification No.4 to the Concept Plan was approved on 16 December 2010 and allows for the following:

- a mixed use development involving a maximum of 563,965 m² mixed use development across the entire 22 ha Barangaroo site, within 7 blocks, comprising:
 - a maximum of 514,465 m² mixed uses GFA, including residential, commercial and retail uses which includes:
 - o a maximum of 128,763 m² of residential uses (a minimum of 99,763 m² of which will be in Barangaroo South);
 - o a maximum of 50,000 m² of tourist uses GFA;
 - o a maximum of 39,000 m² of retail uses;
 - a maximum of 4,500 m² of active uses GFA (3,000 m² of which will be in Barangaroo South); and
 - a maximum of 12,000 m² of community uses GFA (10,000 m² of which will be in Barangaroo South);

- approximately 11 hectares of new public open space/public domain, with a range of formal and informal open spaces serving separate recreational function and including a 2.2km public foreshore promenade;
- built form principles, maximum building heights and GFA for each development block within the mixed use zone;
- public domain landscape concept, including parks, streets and pedestrian connections; and
- alteration of the existing seawalls and creation of a portion of the new shoreline to the Harbour.

A modification to the Concept Plan will be required to make concrete batching plant a permissible temporary use at Barangaroo South. This process will be carried out separately, but concurrently, with the SSD Development Application.

A number of Project Approvals have been obtained for works at Barangaroo South, including for bulk excavation and the construction of an integrated building basement (including temporary use of a concrete batching plant being Modification 4 to MP10_0023), some remediation activities, as well as for buildings C3, C4 and C5. Construction work has commenced at Barangaroo South under these Project Approvals and the majority of the site is now a construction site.

3.0 PROJECT DESCRIPTION

In order to produce concrete on-site a temporary concrete batching plant (the Plant) will be erected and operated on an area of hardstand concrete on the Barangaroo South site, to the north of the Approved Project basement 1A, as shown at **Figure 2**.

The basic function of the Plant is to mix water, cement, fine and coarse aggregates, and admixtures to form wet mix concrete. The Plant will comprise a number of specific elements including:

- Cement silos with a filter bag system — to store cement powder for inclusion within the batched concrete;
- Split drum mixer — to mix raw materials to create concrete;
- Aggregate weigh bins — to accurately measure quantities of sand and aggregates reducing wastage;
- Dust extraction system — to extract airborne cement powder around the inlet to the split drum mixer;
- Above ground level settlement and storage pits (no excavation is proposed) — to manage the cementitious water runoff around the cement loading point and mixer areas;
- Water holding tanks — to provide a buffer of required water and to manage recycled water for use within the batching of concrete;
- Silo ladders and platform — for access to service cement filters and operate the plant;
- Batch conveyor with cover — to reduce windblown dust from conveyor;
- Batch office — to operate the plant and ensure appropriate supervision of plant and stockpile areas;
- Electrical switchboard container — to house electrical components as per legislative requirements; and
- Admixture tanks and bunds (steel) — to ensure any leaks are contained.

The plant will have the capacity to produce approximately 2,000 m³ of pre-mixed concrete per day. Actual production will be variable, and depend on the on-site demand for pre-mixed concrete.

The Plant will be operational during work hours authorised for the Approved Project's which it will support. That is, it will generally be operational between 7.00am and 6.00pm Monday – Friday and between 7.00am and 5.00pm on Saturdays, consistent with the approved operating hours for Barangaroo South and the temporary concrete batching plant approved for construction of the basement as Modification 4 to MP10_0023.

A temporary concrete batching plant has already been approved for construction of the basement, as Modification 4 to MP10_0023. As such, the temporary concrete batching plant will already be in place prior to the determination of the SSD Development Application. If approval is granted for the concurrent and continuing use of the temporary concrete batching plant in the construction of buildings, structures and civil works associated with the development of Barangaroo South then there would be no period of construction or installation, and it is intended that the concrete from the Plant would be used immediately upon approval being granted (subject to fulfilling any conditions of approval) and would continue for the duration of works associated with Barangaroo South. Based on the current indicative development programme the Plant will be operational until December 2014.

4.0 STATUTORY REQUIREMENTS

Schedule 3 of the *State Environmental Planning Policy (Major Development) 2005* (Major Development SEPP) identifies a number of sites in NSW that are determined to be State Significant Sites. This schedule rezones these sites and determines appropriate development controls. Through this listing, the local provisions and controls of any Environmental Planning Instrument are overridden by the Major Development SEPP.

In accordance with Schedule 3, Part 12 of the Major Development SEPP, the Site is zoned B4 Mixed Use and RE1 Public Recreation. Within these zones development for the purposes of a concrete batching plant is prohibited. An application to modify the Barangaroo Concept Plan (MP06_0612) is being progressed concurrently in order to make the temporary use of a concrete batching plant permissible at Barangaroo South.

Lend Lease considered that there are many advantages in retaining a State coordinated assessment function in relation to the temporary concrete batching plant at Barangaroo, and requested that the Minister consider making the development SSD in accordance with Section 89C of the EP&A Act. On the 19 April 2013 the Minister for Planning and Infrastructure issued an Order declaring the Concrete Batching Plant to be State significant development under section 89C(3) and for the purposes of the EP&A Act. As the development is SSD, it is therefore requested that the DGRs be issued for the EIS that will support the SSD application.

5.0 PRELIMINARY ENVIRONMENTAL ASSESSMENT

The proposed temporary concrete batching plant will not impact on any aspect of the permanent development at Barangaroo. It will be a temporary operation to support construction works only, and will be removed once bulk concrete is no longer required for the development. As such, the preliminary environmental assessment has considered only the matters relating to the construction of Barangaroo.

5.1 Construction Traffic

The concrete required to service the Barangaroo site would need to be sourced externally off-site and transported to the Barangaroo precinct via the local and regional road network. Under

existing conditions, concrete truck deliveries to the construction site via traditional concrete agitator trucks would be required frequently throughout the day, including during the peak commuter periods.

On days of large concrete pours, up to 2,000 m³ of pre-mixed concrete is required to service the site, requiring approximately 300 concrete truck loads (600 movements) per day or up to 37 truckloads (74 movements) in the peak hour.

The presence of an on-site concrete batch plant would allow for the delivery of bulk raw materials to occur outside the commuter peak hours, reducing the impact on the local road network during peak periods. This has the potential to improve the operation of each of the assessed intersections to levels similar to existing. Delaying the arrival times of heavy vehicle movements to outside the commuter peak hours would provide a significant benefit not only to the intersections assessed, but also the wider Sydney road network.

In addition, the temporary operation of the Plant would allow for the production of pre-mixed concrete on-site, confining concrete truck movements to bulk raw materials only and therefore significantly reducing the overall number of truck movements associated with concrete pours. The Plant would result in up to a 30% reduction in overall site concrete truck movements, equivalent to a reduction of 23 truck movements in the peak hour.

Trucks will approach the basement construction site from holding areas located outside the CBD, to be called up when needed via an on-site central logistics centre. The reduction in heavy vehicle movements associated with the concrete batch plant would reduce the pressure on these holding areas and reduce the frequency of on-site vehicle queuing. This would in turn facilitate improved access for other construction vehicles accessing the Barangaroo worksites.

It is proposed that the current approved traffic routes, and pedestrian / traffic management measures would be retained.

Traffic modelling will be provided as part of the SSD EIS to accurately quantify the overall improvement that can be expected to key local intersections.

The proposal would allow for pre-mixed concrete to be pumped directly from the onsite batch plant, rather than being transported within the site via concrete agitator trucks. This results in a significant reduction in the number of internal vehicular site movements, improving site circulation, legibility and safety.

5.2 Construction Air Quality

Potential sources of air pollution associated with the operation of the Plant comprises emissions from machinery and the generation of dust, including

- cement delivery system;
- cement discharge to split drum mixer;
- loader operations between aggregate storage and aggregate weigh bins;
- aggregate discharge to split drum mixer;
- delivery and storage of aggregates on site; and
- movement of concrete tippers on site.

Given the reduction in truck numbers it is expected that the additional dust emissions due to the Plant and subsequent potential contribution to cumulative impacts are anticipated to be low and unlikely to be able to be discernible from other emissions from the site.

Notwithstanding this, the SSD EIS will include an assessment of the Plant against the Best Management practice (Concrete) Guideline (DECCW 2004) from the NSW Office of Environment and Heritage, in order to identify appropriate safeguards and mitigation measures.

The SSD EIS will include an air quality impact assessment including modelling of short term average period particulate (24 hour average PM₁₀) for receptors along Hickson Road.

With regards to greenhouse gas emissions and embodied carbon at the development, the significant in construction traffic associated with delivery of concrete to and around the site will result in a similarly significant reduction in the embodied carbon of the development through savings of up to 80% of the transport fuel burn. The SSD EIS will quantify the greenhouse gas and embodied carbon benefits.

5.3 Construction Noise and Vibration

The temporary operation of the proposed Plant has the potential to result in construction noise and vibration, notwithstanding that the reduction in concrete agitator truck movements has a consequent improvement. It is also noted that the location of the plant on the western side of the site provides for maximum distance, and hence buffer, from the residences on Hickson Road in proximity to the site.

A noise and vibration assessment will be provided with the SSD EIS to calculate the overall cumulative noise levels that are predicted at surrounding receivers. The noise and vibration assessment will also take into account the reduction in traffic volumes, which will also reduce the noise contribution from this source to surrounding receivers.

5.4 Soil and Water

Because of the status of the site as a construction site, the installation, operation and removal of the proposed concrete batching plant is not expected to significantly increase the site's potential soil and water impacts nor will it rely on the substantive modification of the construction soil and water management regime.

The SSD EIS will review the existing Environmental Construction and Site Management Plan for the Plant at Barangaroo South, prepared by Cardno and Lend Lease Project management and Construction. If necessary the Plan will be updated to include updated erosion and sediment controls and updated stormwater management measures for the construction site.

5.5 Waste

Because of the status of the site as a construction site, the installation, operation and removal of the proposed concrete batching plant is not expected to significantly increase the site's potential impacts in regards to the generation or disposal of waste.

The SSD EIS will review the existing Environmental Construction and Site Management Plan for the Plant at Barangaroo South, prepared by Cardno and Lend Lease Project management and Construction. If necessary the Plan will be updated to include updated waste management measures for the construction site.

5.6 Visual Analysis

The Plant will be visible from the public domain, the water and waterfront promenade, and various residential and commercial properties which have views over the affected part of site. Whilst the Plant is industrial in appearance, it is considered to have very few, if any, adverse visual impacts as it:

- has been located on the western side of the site to increase the visual separation from uses along Hickson Road and Kent Street;
- is only temporary and is visually consistent with the other construction plant and activities currently occurring on the site and the previous use of site as a container wharf;
- is much smaller than the built form approved under Concept Plan (Mod 4) which is considered to be appropriate to the site's context and to the desired urban form and scale for the western part of the Sydney CBD; and
- will not significantly affect any views.

6.0 CONCLUSION

The purpose of this letter is to request the DGRs for the preparation of an EIS for a temporary concrete batching plant at Barangaroo. We trust that the information detailed in this letter is sufficient to enable the Director-General to issue the DGRs for the preparation of the EIS.